

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MULLEN INDUSTRIES LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 6:22-cv-00145-ADA

DEFENDANT APPLE INC.'S UNOPPOSED MOTION TO EXPAND PAGE LIMITS

By this Motion Defendant Apple Inc. (“Apple”) seeks to expand the page limit for its Sealed Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) from fifteen pages to no more than twenty pages. This Motion is not made to cause either the Plaintiff or the Court to do unnecessary extra work. Instead, it is requested so the fact intensive private and public factors governing motions to transfer can be presented to the Court in a fair but efficient fashion. Apple has made every effort to present its arguments as succinctly as possible and has agreed with Plaintiff that the page limit for its response to the Motion is also expanded to no more than 20 pages. Because the Court and its staff’s work load are impacted by this motion (albeit only slightly) and it involves a page limit rather than a deadline, the parties have proceeded by Motion instead of by Notice.

Dated: August 17, 2022

Respectfully submitted,

Alton L. Absher III (admitted in W.D. Tex.)
Kilpatrick Townsend & Stockton LLP
1001 West Fourth Street
Winston-Salem, NC 27101-2400
Tel: (336) 607-7300
Fax: (336) 607-7500
Email: aabsher@kilpatricktownsend.com

/s/ J. Stephen Ravel
J. Stephen Ravel
Texas State Bar No. 16584975
Kelly Hart & Hallman LLP
303 Colorado, Suite 2000
Austin, Texas 78701
Tel: (512) 495-6429
Email: steve.ravel@kellyhart.com

Steven D. Moore (admitted in W.D. Tex.)
April Abele Isaacson (*pro hac vice*)
Rishi Gupta (*pro hac vice*)
Kilpatrick Townsend & Stockton LLP
Two Embarcadero Center, Suite 1900
San Francisco, CA 94111
Tel: (415) 576-0200
Fax: (415) 576-0300
Email: smoore@kilpatricktownsend.com
Email: aisaacson@kilpatricktownsend.com
Email: rgupta@kilpatricktownsend.com

Attorneys for Apple Inc.

Mansi H. Shah (*pro hac vice*)
Kilpatrick Townsend & Stockton LLP
1302 El Camino Real, Suite 175
Menlo Park, CA 94025
Tel: (650) 752-2445
Fax: (650) 618-8641
Email: mansi.shah@kilpatricktownsend.com

Aarti Shah (*pro hac vice*)
Kilpatrick Townsend & Stockton LLP
607 14th Street, NW, Suite 900
Washington, DC 20005-2018
Tel: (202) 481-9937
Fax: (202) 204-5620
Email: ashah@kilpatricktownsend.com

Kathleen R. Geyer (*pro hac vice*)
Patrick M. Njeim (*pro hac vice*)
Kilpatrick Townsend & Stockton LLP
1420 Fifth Avenue, Suite 3700
Seattle, WA 98101
Tel: (206) 467-9600
Fax: (206) 299-3458

Email: kgeyer@kilpatricktownsend.com
Email: pnjeim@kilpatricktownsend.com

CERTIFICATE OF CONFERENCE

I hereby certify that on August 17, 2022, Apple's counsel and Mullen's counsel are in agreement regarding the relief sought in this Motion, and this Motion is being submitted as unopposed.

/s/ J. Stephen Ravel
J. Stephen Ravel

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record are being served with a copy of the foregoing document via the Court's CM/ECF filing system on August 17, 2022.

/s/ J. Stephen Ravel
J. Stephen Ravel